

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|  |   |                             |
|--|---|-----------------------------|
| <b>In the Matter of</b>                      | ) |                             |
| <b>Telecommunications Relay Services and</b> | ) |                             |
| <b>Speech-to-Speech Services for</b>         | ) | <b>CC Docket No. 98-67</b>  |
| <b>Individuals with Hearing and Speech</b>   | ) |                             |
| <b>Disabilities</b>                          | ) |                             |
|  | ) |                             |
| <b>Americans With Disabilities Act</b>       | ) | <b>CG Docket No. 03-123</b> |

**REPLY TO PETITIONS FOR RECONSIDERATION  
WORLDCom, INC. d/b/a MCI**

WorldCom, Inc., d/b/a/ MCI, hereby responds to Petitions for Reconsideration filed by Verizon and A&T in response to the Commission's Second Improved TRS Order.<sup>1</sup>

Both Verizon and AT&T argue that the Commission's decision to require telecommunications relay service (TRS) providers to update their databases linking appropriate public service answering providers (PSAPs) with caller ANIs on the same schedule as local exchange companies (LECs) is expensive and inefficient. Verizon asks the Commission to amend its rule so that TRS providers are required to route calls to an

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<sup>1</sup> In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67; Americans With Disabilities Act , CG Docket No. 03-123, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking ("Second Improved TRS Order"), rel June 17, 2003.

appropriate PSAP and then “define appropriate PSAP as either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the call in an expeditious manner.”<sup>2</sup> AT&T proposes the Commission mandate the development of a single PSAP database that would be made available to each TRS provider. This effort would be funded through the Interstate TRS Fund, and administered by the National Exchange Carrier Association (“NECA”). AT&T’s proposal would also require LECs to provide updated information to the administrator of this national database as they update their 911 selective routers.<sup>3</sup>

MCI agrees with both Verizon and AT&T that the Commission’s current PSAP requirement should be modified, and specifically recommends that the Commission recognize that updating TRS PSAP databases instantaneous with LEC updates of their selective routers is not currently feasible. Nor does the record support this ability. In its Second Improved TRS Order, the Commission identified record support showing TRS providers had developed national PSAP databases, but did not identify any party who claimed it was currently feasible for TRS providers to update these databases on the same schedule as LECs.<sup>4</sup>

MCI supports either Verizon’s or AT&T’s proposal. Verizon’s proposal would be least expensive and, to MCI’s knowledge, is currently being met by all TRS providers.

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<sup>2</sup> Verizon Petition for Reconsideration, filed September 24, 2003, at 2.

<sup>3</sup> AT&T Petition for Reconsideration, filed September 24, 2003, at 7.

<sup>4</sup> Second Improved TRS Order, & 42.

And, as Verizon points out, many PSAPs are “hot wired” to each other, and the call can be transferred to a more appropriate PSAP almost instantaneously.<sup>5</sup>

AT&T’s proposal would initially be more expensive, because it would require building a single, national PSAP database. However, it might be less expensive over time, since database updates would be performed by a single entity, rather than by each TRS provider, as is currently the case. AT&T’s proposal has the advantage of increasing the frequency with which TRS providers’ 911 databases would be updated, coming very close to the frequency attained by LECs, and thereby almost certainly ensuring that a 911 call dialed through relay will reach the same PSAP as would have been reached had the caller dialed 911 directly.<sup>6</sup> As an alternative to giving NECA this administrative role, the Commission should consider requiring LECs to provide output of their updated PSAP information to each TRS provider at the same time as they update their 911 selective routers.

In summary, the Commission should recognize that there is no economically feasible solution that would allow TRS providers to have instantaneous access to updated 911 information contained in LEC selective routers.<sup>7</sup> MCI supports either Verizon’s solution, which would “define appropriate PSAP as either a PSAP that the caller would

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<sup>5</sup> Verizon Petition for Reconsideration, CC Docket No. 98-67, filed September 24, 2003, at 4.

<sup>6</sup> As Verizon points out, certain data fields may need to be re-categorized and matched in order to be properly incorporated into a single, national file. Verizon Reply Comments, Second Improved TRS Proceeding, CC Docket No. 98-67, filed September 13, 2002, at 4; Verizon Petition for Reconsideration, Second Improved TRS Order, filed September 24, 2003, at 6. However, given the low volume of 911 calls dialed through relay centers, it is unlikely the slight lag between receipt and entry of updated PSAP-ANI databases would result in an actual discrepancy between a PSAP reached through relay and a PSAP reached by directly dialing 911.

<sup>7</sup> Verizon Petition for Reconsideration, at 6.

have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the call in an expeditious manner; or a solution of the type proposed by AT&T, which would require LECs to provide updated output files from their 911 selective routers to either an administrator of a national PSAP database, or to individual TRS providers.

Respectfully submitted,

**Larry Fenster**

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## **Statement of Verification**

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2003

**Larry Fenster**

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### Certificate of Service

I, L. Elizabeth Bryant, do hereby certify that copies of the foregoing Petition for Reconsideration of WorldCom Inc. were sent on this 20<sup>th</sup> day of October, 2003, via first-class mail, postage pre-paid, to the following:

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